



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RB:TK
F.#2010R00420

271 Cadman Plaza East
Brooklyn, New York 11201

January 19, 2012

BY FEDEX

Susan R. Necheles, Esq.
500 Fifth Avenue
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New York, NY 10110

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140 Broadway
38th Floor
New York, New York 10005

Re: United States v. Pedro Espada Jr., et al.
Criminal Docket No. 10-985 (FB)

Dear Counsel:

Please find enclosed a DVD labeled "January 2012 Production," which contains copies of documents that were provided to the government by various parties. The documents provided herein are organized according the following table:

Party/File Name	Bates Range
GMAC	Jan2012000001 - Jan2012000098
Markstaar	Jan2012000099
HRSA	Jan2012000395 - Jan2012001029
Max Noble	Jan2012001030 - Jan2012001161
Dinesh Pharmacy Checks	Jan2012001162 - Jan2012001171
NYC - Department of Finance - City Register - 572 Leeland Ave - Deed	Jan2012003670 - Jan2012003679

Please also find enclosed a DVD labeled "CBS - April 20, 2009 6PM" which contains footage from a news broadcast aired on April 20, 2009, and is Bates-stamped Jan2012003669.

Please also find herein American Express statements that were previously provided to you on January 7, 2011, and are

provided to you again, this time in color, Bates-stamped
Jan2012001172 - Jan2012002274.

Please also find herein the following files that were previously provided to you on January 7, 2011 and March 29, 2011. Please note that these documents are now Bates-stamped so that they may be referenced at trial and can be found according to the following table:

Party	Discovery date	Bates Range
Robert Borella, CPA	March 29, 2011	Jan2012000100 - Jan2012000394
Marks Paneth Shron Emails	January 7, 2011	Jan2012002275 - Jan2012002646
Marks Paneth Shron Files	January 7, 2011	Jan2012002647 - Jan2012003668 and Jan2012003680 - Jan2012004009

If you wish to review the originals of any documents, please contact me and we will arrange a mutually convenient time for you to do so. If you have any further questions or requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Todd Kaminsky
Assistant U.S. Attorney

Enclosures